

To: Moore, Bruce[Moore.Bruce@epa.gov]; Smith, Claudia[Smith.Claudia@epa.gov]
Cc: Stoneman, Chris[Stoneman.Chris@epa.gov]; Rothery, Deirdre[Rothery.Deirdre@epa.gov]
From: Howard, Jodi
Sent: Thur 4/14/2016 6:04:38 PM
Subject: RE: oil gas NSPS snapshot as of today

Well sites: semi-annual using either OGI or M21 (500 ppm)

Compressor stations: quarterly using either OGI or M21 (500 ppm)

As Bruce stated, processing plants equipment leak requirements have not changed (NSPS VVa). Monitoring frequencies vary depending on the type of equipment.

From: Moore, Bruce
Sent: Thursday, April 14, 2016 2:01 PM
To: Smith, Claudia
Cc: Stoneman, Chris; Howard, Jodi; Rothery, Deirdre
Subject: RE: oil gas NSPS snapshot as of today

The Gas plant LDAR is unchanged in the NSPS from what it was in 2012 and is separate from the fugitive requirements for well sites and compressor stations. Maybe Jodi can do a better job of clarifying.

Bruce Moore

Senior Technical Advisor - Oil & Natural Gas Sector

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For information, visit: www3.epa.gov/airquality/oilandgas

From: Smith, Claudia
Sent: Thursday, April 14, 2016 1:59 PM
To: Moore, Bruce <Moore.Bruce@epa.gov>
Cc: Stoneman, Chris <Stoneman.Chris@epa.gov>; Howard, Jodi <Howard.Jodi@epa.gov>; Rothery, Deirdre <Rothery.Deirdre@epa.gov>
Subject: RE: oil gas NSPS snapshot as of today
Importance: High

Hi, Bruce,

I am trying to rewrite the U&O FIP to be consistent with the LDAR requirements in the final NSPS OOOOa that OMB is currently reviewing. I want to make sure I am characterizing the LDAR monitoring frequency correctly. Generally, is it correct to say monitoring is required semi-annually for well sites, quarterly for compressor stations, and at least quarterly for natural gas processing plants (with varying frequency as specified in NSPS VVa)? If not, can you please clarify the distinction?

Thanks,

Claudia

From: Moore, Bruce
Sent: Tuesday, April 12, 2016 3:43 PM
To: Card, Joan <Card.Joan@epa.gov>
Cc: Smith, Claudia <Smith.Claudia@epa.gov>; Beeler, Cindy <Beeler.Cindy@epa.gov>; Rothery, Deirdre <Rothery.Deirdre@epa.gov>; Koerber, Mike <Koerber.Mike@epa.gov>; Zenick, Elliott <Zenick.Elliott@epa.gov>
Subject: FW: oil gas NSPS snapshot as of today

Joan,

Per our discussion this afternoon regarding Elliott's comments on the U&O FIP, here is the very latest version of the NSPS that reflects any minor changes made since the rule went to OMB. As you mentioned, this will allow the FIP team to respond to Elliott's comment that the FIP should accurately reflect (where intended) the NSPS final rule rather than what was in the September proposal, given the significant changes since proposal.

Of course this is not to be distributed.

Hope this is helpful,

Bruce

Bruce Moore

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From: Hambrick, Amy
Sent: Tuesday, April 12, 2016 5:30 PM
To: Moore, Bruce <Moore.Bruce@epa.gov>
Subject: oil gas snapshot

Amy Hambrick

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